

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

ALEX GOLDMAN,)	
)	
Plaintiff,)	Civil Action No.: 18-CV-3662-JFB-ARL
)	
-against-)	
)	
CATHERINE REDDINGTON)	
)	
Defendant.)	

**DECLARATION OF GABRIELLE M. VINCI, ESQ. IN SUPPORT OF MOTION TO BE
RELIEVED AS COUNSEL**

GABRIELLE M. VINCI, ESQ. hereby declares subject to the penalties of perjury pursuant to 28 U.S.C. § 1746:

1. I am an associate attorney at the firm Nesenoff & Miltenberg, LLP (the “Firm”), attorneys for the defendant Catherine Reddington (“Defendant” or the “Client”), and as such I am fully familiar with the facts and circumstances of this matter and this Declaration.

2. I make this Declaration in support of this Firm’s application to be relieved as counsel for Defendant.

3. Due to a conflict of interest, the Firm cannot continue its representation of Defendant.

4. On or about July 13, 2018, I filed a Notice of Appearance on behalf of Defendant in order to file a letter requesting an adjournment of a conference set for July 16, 2018 due to the fact that the Firm had only been recently retained by Defendant.

5. On or about July 14, 2018, Plaintiff’s counsel sent a letter via email to both me and Andrew Miltenberg, Managing Partner at the Firm, requesting that we withdraw as counsel for Defendant due to a perceived conflict of interest.

6. Following receipt of Plaintiff's counsel's letter, the Firm ceased all substantive work on this matter in order to investigate Plaintiff's claim that the Firm could not proceed with its representation of Defendant.

7. Upon investigation, the Firm has determined that a conflict of interest may exist precluding the Firm from continuing with its representation of Defendant in this matter. In the interests of caution, the Firm has determined that it cannot continue to represent Defendant in this matter.

8. The Client has been duly notified that the Firm has discovered a potential conflict of interest and has been advised that the Firm will seek to withdraw as counsel. The Client does not object to this application and is in the process of finding new counsel to represent her moving forward in this matter.

9. On July 24, 2018, I contacted Plaintiff's counsel and advised that the Firm would be seeking to be relieved as counsel.

10. There has been no prior application for the relief sought therein. The Client has been served with a copy of this application.

11. Wherefore, the Court should grant this application in its entirety, and should order such further and other relief as the Court deems just and proper.

I declare under the penalty of perjury that the foregoing is true and correct, pursuant to Title 28, United States Code, Section 1746.

Dated: New York, New York
July 27, 2018

/s/ Gabrielle Vinci
Gabrielle M. Vinci, Esq.